

To: Tab Sommer, Harriet Croke, SLIVERS, BUDAS Subject: Re: Region 5 GPRA important!!!!!!!!!!!!



Tab.

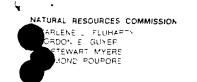
We would like to make the following changes to the GPRA baseline post-closure and operating universes:

- 1) BASF Corp (MID 064 197 742), Seq.# 1 Drums
 Remove this facility/unit from the GPRA baseline post-closure universe.
 - 2) Delphi Energy and Engine Mgt. System, Grand Rapids, (MID 005 356 647), #2 Tanks Add this facility/unit to the GPRA baseline post-closure universe.
 - 3) Delphi Energy and Engine Mgt. System, Grand Rapids, (MID 017 079 625), #2 Waste Liq Cyanide Make a change to reflect that the facility does not have approved control in place for the GPRA baseline post-closure universe.
 - 4) Dow Corning, Midland, (MID 000 809 632), #5, Quench Pond Add this facility/unit to the GPRA baseline post-closure universe.
 - 5) Ford Motor Company Allen Park, Clay Mine, MID 980 568 711, #2 PC LF Cell Add this facility/unit to the GPRA baseline post-closure universe.
 - 6) Michigan DNR, Roscommon, (MID 980 825 632), #2 Toxaphene Pit Add this facility/unit to the GPRA baseline post-closure universe.
 - 7) Total Petroleum, Alma, (MID 005 358 130), #4 Pond1TC, #5 STANDBY1TC, #6 STANDBY2TC, #7 STANDBY3TC

Make a change to reflect that the units do not have approved control in place for the GPRA baseline post-closure universe.

In addition, Add unit Pond 2.

- 8) GMC Coldwater Road, Flint, (MID 005 356 860), #3 SURF IMP TRT S LAGOON Add this facility/unit to the GPRA baseline post-closure universe.
- 9) Systech Environmental Corp., (MID 981 200 835), #1 Tank 1, #2 Tank 2, #3 Tank3, #4 Tank4, #5 Tank5, #6 Tank6, #7 Tank7 Add this facility/units to the GPRA baseline operating permit universe.





JOHN ENGLER Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T MASON BUILDING PO BOX 30028 LANSING MI 48909

Delbert Rector DAVID-F-HALES DIRECTOR

June 27, 1991

Mr. H. D. Roush, Manager Quality & Ecology Services Department BASF Corporation Chemicals Division 1609 Biddle Avenue Wyandotte, Michigan 48192

Dear Mr. Roush:

SUBJECT: Closure of Hazardous Waste Container Storage Unit

BASF Corporation, MID 064 197 742

The Michigan Department of Natural Resources (MDNR), Waste Management Division (WMD), has completed a review of the hazardous waste container storage unit closure plan/certification submitted by BASF Corporation (BASF), pursuant to Michigan's Hazardous Waste Management Act, 1979 P.A. 64, as amended (Act 64). The closure plan/certification was submitted on November 8, 1988. Based on this review, the WMD has determined that the cleanup activities associated with the closure of the container storage unit and the closure plan/certification fail to demonstrate clean closure in accordance with the closure performance standard established in R 299.9601 of the Act 64 administrative rules, and 40 CFR §§265.111 and 265.197. Therefore, a clean closure determination is denied. The WMD recognizes the status of the container storage unit as closed.

Financial Capability Requirements for Closure

Since the container storage unit has been closed, BASF is hereby released from the financial capability requirements for closure assurance and liability coverage under Part 7 of the Act 64 administrative rules. BASF is therefore no longer required to use the financial test to demonstrate financial capability for closure of this facility.

Post-Closure Requirements

Facilities failing to close in accordance with the closure performance standard are required to comply with the post-

closure requirements of 40 CFR §§265.117 - 265.120, and Part 7 of the Act 64 administrative rules. However, BASF is also subject to the requirements of Consent Decree #80-73699 entered between the State of Michigan and BASF in Federal District Court on November 12, 1985. Inquiries with MDNR, Environmental Response Division staff, indicate that BASF is in compliance with the Consent Decree at this time. BASF must maintain compliance with the Consent Decree. Therefore, the WMD is not requiring BASF to submit a post-closure plan and comply with the other post-closure requirements referenced above at this time.

Incorrect 83-120 CV-4712DT. DT. 12/30/93

Corrective Action Responsibilities

BASF is advised that this release of financial capability requirements for the closure of the container storage unit does not release the company from any corrective action responsibilities under the Resource Conservation and Recovery Act of 1976 (RCRA), as amended by the Hazardous and Solid Waste Amendments of 1984. Questions regarding BASF's corrective action responsibilities should be directed to Mr. Rich Traub, Chief, Michigan Section of the RCRA Permitting Branch, Region 5, U.S. Environmental Protection Agency, at telephone number 312-886-6136.

Please contact Ms. Ronda L. Hall, Environmental Engineer, Waste Management Division, at 517-373-9548, if you have any questions.

Sincerely,

Delbert Rector

Director

900 766 4

517-373-2329

cc: Mr. Adam Bickel, BASF

Ms. Lorraine Kosik, U.S. EPA

Mr. Rich Traub, U.S. EPA

Mr. Steve Buda, DNR

Ms. Ronda L. Hall, DNR

Mr. Dave Slayton, DNR

Ms. JoAnn Merrick, DNR

Mr. Tom Sampson, DNR

Mr. Charles San Juan, DNR

HWP/C&E File

BASF CorporationChemicals Division

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BASF

November 7, 1988

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Waste Management Division

Mr. Kenneth J. Burda Michigan Dept. of Natural Resources Hazardous Waste Permits Section Waste Management Division P. O. Box 30028 Lansing, MI 48909

Dear Mr. Burda:

Subject: Closure Plan for Hazardous Waste Storage Units BASF Corporation Chemicals Division MID 064197742

In compliance with the agreed upon November 8, 1988 submittal date, please find enclosed the Closure Plan to allow for the withdrawal of Interim Status for on-site storage of hazardous waste materials in excess of 90 days at BASF Corporation's Wyandotte North Works site.

If you have questions, please contact me at (313) 246-6106.

Sincerely

H. D. Roush

Manager

Quality & Ecology Services Dept.

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BASF Wyandotte Corporation



Wyandotte, Michigan 48192 313 246-6100 TWX: 810-231-5756 (BASFWYAN)

April 23, 1985

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
No. P 447 526 723

Mr. William G. Muno, Chief U. S. Environmental Protection Agency Hazardous Waste Enforcement Branch RCRA Enforcement Section - 5HE-12 230 South Dearborn Street Chicago, IL 60604



Re: Letter of Warning

BASF Wyandotte Corporation

MID 064 197 742

Dear Mr. Muno:

Per your March 29, 1985 request, BASF Wyandotte Corporation (BWC) is forwarding to your attention an up-to-date Closure/Post Closure Plan for the Wyandotte Works MID 064 197 742. Two (2) copies have also been forwarded to the Michigan Department of Natural Resources.

Yours truly,

H. D. Rousk

Manager

Quality Assurance, Hygiene and Environmental Protection

mh enc.

cc: Michigan Dept. of Natural Resources

Hazardous Waste Division 15500 Sheldon Road

15500 Sheldon Road Northville, MI 48167

Certified #P 447 526 724



S.E. Michigan Field Office 15500 Sheldon Road Northville, MI 48167

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

RONALD O SKOOG, Director

January 23, 1985

BASF Wyandotte Corp 1609 Biddle Avenue Wyandotte, Mich.

RE: MID 064197742

Gentlemen:

TURAL RESOURCES COMMISSION

THOMAS J ANDERSON E R CAROLLO MARLENE J FLUHARTY

STEPHEN F MONSMA O STEWART MYERS

RAYMOND POUPORE HARRY H WHITELEY

As part of our FY85 Hazardous Waste Management Cooperative Agreement with the U.S. EPA, we are obligated to review the adequacy of the closure and post-closure plans for all hazardous waste treatment storage and disposal facilities (TSDFs) in the state.

Your facility falls under this classification. Therefore, please submit two up-to-date copies of your closure plan for your treatment, storage, and disposal facility by February 15, 1985.

The above should be sent to the following address:

Hazardous Waste Division Michigan Department of Natural Resources 15500 Sheldon Road Northville, MI 48167

If you have any questions regarding this letter, please contact me at (313) 459-9180.

Sincerely,

Benedict N. Okwumabua, PhD.

District Supervisor

Hazardous Waste Division

cc: U.S. EPA

J. Bohunsky

A. Howard



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THE RESIDENCE

MACE Spendates (organition Main Bightle Avenue Grandotte, Michigan 48192

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Spot Jenen:

by Jamuary 23, 1985, the Michigan Department of Natural Resources (1988), requested the BASF Byandotte Germanation to setable a copy of their Slotters plan. To date, NORR has het received the corposation's clusure plan.

The point is addigated to review the adequacy of clasure plans ender of ore all subject & through the FY 85 Negardown Marke Cooperative Operations with the U.S. Environmental Finteetigh Supply (U.S. SPA).

Because the Mair Hyendette Corporation Mellow to Makedt a copy of their classic plan to MONK the U.S. EPA is requested that BASE Myendotte torphretion provide our Agency with a day of the siegere plan. Failure to provide this plan within 30 days of require of this potion will subject the facility to days on require of the potion will subject the facility to days on require. Plant or the government of the potion of an ap-to-date closure plan to:

U.S. Environment of Problems & Against Mazardege Maste Environment & Funda MCRA Enforcement Section - SHE-12 230 South Decreors Street Chicago, Illinois 50008

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BASF Wyandotte Corporation



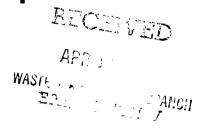
April 9, 1981

BASF Wyandotte Corporation 1609 Biddle Avenue Wyandotte, Michigan 48192

MID 064 197 742

The maps and drawings furnished with the original application (11/17/80) are valid, except for reference to the surface impoundment. Kindly strike out all labels referring to "surface impoundment", as per the reproductions attached to this revised application.

BASF Wyandotte Corporation





100 Cherry Hill Road P.O. Box 181 Parsippany, N.J. 07054 201/263-0200

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April 8, 1981 Certified Mail Return Receipt Requested P29-2144602

Permit Contact (5EP) U. S. Environmental Protection Agency 230 South Dearborn Street Chicago, Ill. 60604

Gentlemen:

Pursuant to a meeting held on April 2, 1981 with Mr. J. Boyle of your organization, BASF Wyandotte Corporation is submitting a revised and modified RCRA interim permit application. original application was sent to you on November 17, 1980.

Key modifications are as follows;

- 1. Application for use of a surface impoundment for treatment has been deleted.
- 2. All wastes identified as "DOOO" only have been deleted. (Form 3, page 3).

Surface Impoundment Deletion

The original application included the use of surface impoundment for treatment as a protective action on our part. Normal wastewater flow to the pond is non-hazardous. Once during the past several years an unplanned and sudden spill of a hazardous waste was collected and contained in the pond and removed to rail cars within a 48-hour period. This was a one-time emergency action only. Due to the pond's impermeability (clay base) the short-term action to cleanup the spill prevented environmental contamination.

Subsequent to our original application, on Nov. 19, 1980, EPA published at 45 FR 76626 a definition of a spill as "---the accidental spilling, leaking, pumping, emitting, emptying or dumping of hazardous wastes or materials which, when spilled, become hazardous waste into or on any land or water", (40CFR260.10(a) (64a)). EPA also promulgated at 40CFR122.21(d) (3) the regulation that "A person is not required to obtain a RCRA permit for those activities he carries out to immediately contain or treat a spill ----". The pond in question clearly falls under the above exclusion.

Waste Deletion

Those wastes originally designated on our application are not RCRA hazardous wastes per 40CFR260; rather, they are wastes which BASF has voluntarily decided to manage as if they were hazardous for self-protective reasons. Mr. Boyle, as well as other EPA officials of other regions, indicated that DOOO was an invalid code.

Due to the permitting exclusion allowed for activities taken to immediately mitigate a spill plus the fact that only non-hazardous waste generally enters the discussed pond, BASF has decided to discontinue further interim status actions for that particular facility.

Kindly inform us within thirty (30) days if our interpretations or decisions are incorrect. Thank you for your assistance.

Very truly yours,

M. A. Wisniewski, P.E.

Manager

Corporate Environmental Protection

For the Office of the Director, Corporate Environmental Protection

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